

EXHIBIT 29
FILED UNDER SEAL

Page 1

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF TEXAS
3 SHERMAN DIVISION
4 - - -

5 THE STATE OF TEXAS, et al. : Civil Action No.
6 Plaintiffs, : 4:20-cv-00957-SDJ
7 vs. :
8 GOOGLE LLC, :
9 Defendants. :
10 - - -

11 April 19, 2024
12 HIGHLY CONFIDENTIAL
13 - - -

14 Remote Oral Deposition,
15 taken via Zoom, of [REDACTED] [REDACTED]
16 commencing at 9:01 a.m., on the above
17 date, before Amanda Maslynsky-Miller,
18 Court Reporter and Certified Realtime
19 Reporter.
20 - - -

21
22
23
24 Job No. MDLG6658171

1 APPEARANCES:
2
3

MAYER BROWN

4 BY: JONATHAN D. JAFFE, ESQUIRE

Two Palo Alto Square

5 3000 El Camino Real

Palo Alto, California 94306

6 jjaffe@mayerbrown.com

(650) 331-2085

7 Representing the Plaintiff,
State of Texas

8
9
10
11 NORTON ROSE FULBRIGHT US LLP

BY: ABRAHAM CHANG, ESQUIRE

12 1301 McKinney

Suite 5100

13 Houston, Texas 77010

(713) 651-5151

14 abraham.chang@nortonrosefulbright.com

15 - and -

16 BY: DANIELLA TORREALBA, ESQUIRE

799 9th Street NW

17 Suite 1000

Washington, DC 20001

18 daniellatorraelba@nortonrosefulbright.com

Representing the Plaintiff

1 APPEARANCES: (Continued)

2
3 AXINN, VELTROP & HARKRIDER LLP
4 BY: DAVID R. PEARL, ESQUIRE
5 1901 L Street NW
6 Washington, DC 20036
7 (202) 912-4700
8 dpearl@axinn.com

9 - and -

10
11 BY: CHRISTOPHER ERICKSON, ESQUIRE
12 114 West 47th Street
13 New York, New York 10036
14 (212) 728-2200
15 cerickson@axinn.com

16 - and -

17
18 BY: DARPAN R. SINGH, ESQUIRE
19 55 Second Street
20 San Francisco, California 94105
21 (415) 490-2000
22 dsingh@axinn.com
23 Representing Google LLC

24 ALSO PRESENT:

Zach Hone, Videographer
Evan Wolfe, Trial, Technician
Melonie Montford Derosé (LLF)
Steven Sparling, Google LLC

- - -

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- - -
I N D E X
- - -

Testimony of: [REDACTED] [REDACTED] [REDACTED]

By Attorney Chang 9

- - -
E X H I B I T S
- - -

NO.	DESCRIPTION	PAGE
Exhibit 110	No Bates [REDACTED] [REDACTED] , Wikipedia Page	25
Exhibit 111	No Bates [REDACTED] [REDACTED] , LinkedIn Page	42
Exhibit 112	GOOG-AT-MDL-008522383-2404 Perf Rating Support Note Template	52
Exhibit 113	GOOG-AT-MDL-017768272-8275 2/28/22 E-mail, [REDACTED] [REDACTED] [REDACTED]	76
Exhibit 114	GOOG-AT-MDL-016488656-8675 [REDACTED] [REDACTED] [REDACTED] [REDACTED]	93
Exhibit 115	GOOG-AT-MDL-B-004637454-7457 11/12/15 E-mail, [REDACTED] [REDACTED] [REDACTED]	158

1			-	-	-					
2			E	X	H	I	B	I	T	S
3			-	-	-					
4										
5	NO.					DESCRIPTION				PAGE
6	Exhibit	116				GOOG-AT-MDL-018794833-4835				
7						8/17/21 E-mail, [REDACTED]				
8						[REDACTED]				179
9	Exhibit	117				GOOG-DOJ-14011118-1120				
10						9/17/14 E-mail, [REDACTED]				
11						[REDACTED]				204
12	Exhibit	118				GOOG-DOJ-32277191-7210				
13						7/9/14 E-mail, [REDACTED]				
14						[REDACTED]				218
15	Exhibit	119				GOOG-NE-13231861-1874				
16						8/9/14 Draft Enhanced Dynamic				
17						Revenue Sharing				256
18	Exhibit	120				GOOG-DOJ-14008627-8633				
19						8/25/15 Ads Postmortem: Lapsed				
20						Launch Experiment Caused AdX				
21						Dynamic Price Loss of				
22						Revenue				259
23	Exhibit	121				GOOG-AT-MDL-014566659-6660				
24						8/25/15 E-mail, [REDACTED]				
						[REDACTED]				259
	Exhibit	122				GOOG-AT-MDL-008962081-2082				
						9/26/18 E-mail, [REDACTED]				
						[REDACTED]				303
	Exhibit	123				GOOG-AT-MDL-012687687-7689				
						2/4/21 E-mail, [REDACTED]				
						[REDACTED]				320
	Exhibit	124				GOOG-AT-MDL-009089549-9550				
						5/31/22 E-mail, [REDACTED]				
						[REDACTED]				329

Page 6

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- - -
E X H I B I T S
- - -

NO .	DESCRIPTION	PAGE
Exhibit 125	GOOG-AT-MDL-019688335-8363 Slide Deck, Publisher Floor Optimizations	342
Exhibit 126	GOOG-AT-MDL-012689344-9346 11/3/21 E-mail, [REDACTED] [REDACTED] [REDACTED]	366

HIGHLY CONFIDENTIAL

Page 372

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

ATTORNEY PEARL: Objection.

Form.

1

2

3

4

5

6

7

8

9

10

11

12

13 BY ATTORNEY CHANG:

14 Q. So you always leave your

15 Chat history on?

16 A. I'm sure there have been

17 some instances, I can't remember the

18 specific times, when I've turned it off

19 over my 13 years at Google.

20 But almost ubiquitously I

21 make a point to leave it on, because it's

22 just easier for me to work with my

23 colleagues in that way and search for

24 things.

1 reflected in e-mail?

2 A. Are all my Chats
3 reflected -- what?

4 Q. I'll rephrase the question.
5 Do you ever talk about
6 anything in your Chats that -- let me
7 rephrase it again.

8 Are there any conversations
9 that you have via Chat that do not show
10 up in your e-mail?

11 ATTORNEY PEARL: Objection.
12 Form.

13 THE WITNESS: Possibly. I
14 can't tell you for sure. I would
15 be surprised if the topics in the
16 Chat were not reflected in the
17 e-mail.

18 But, obviously, the specific
19 conversations I wouldn't repeat in
20 another e-mail, unless I was
21 trying to share those
22 conversations with someone else in
23 an e-mail form. Just kind of
24 normal conversational practice, I

1

2

3

4

5

6

ATTORNEY CHANG: Mr. Wolfe,

7

will you take that document down?

8

Thank you.

9

BY ATTORNEY CHANG:

10

Q. Has a Google employee ever

11

asked to move a Chat conversation

12

offline?

13

ATTORNEY PEARL: Objection.

14

Form.

15

THE WITNESS: I've certainly

16

had times when I was in a Chat

17

with another Google employee where

18

they may have suggested we meet in

19

person to discuss something, if

20

that is your question.

21

Is that what you mean by

22

"offline"?

23

BY ATTORNEY CHANG:

24

Q. Have you ever asked to take

1 a conversation on Chat offline?

2 A. Sorry. I just want to
3 clarify.

4 By "offline," do you mean
5 have the conversation in person?

6 Q. Yes.

7 A. Quite possibly. I don't
8 remember a specific time. But I would
9 not be surprised if at some point I said,
10 hey, do you want to meet in the micro
11 kitchen and talk about this?

12 ATTORNEY CHANG: I don't
13 think I have too much more,
14 counsel. Do you want to take a
15 break, like, ten -- ten minutes,
16 and we'll come back and finish up?

17 ATTORNEY PEARL: That's
18 fine.

19 VIDEO TECHNICIAN: Off
20 record. The time is 5:07.

21 - - -

22 (Whereupon, a brief recess
23 was taken.)

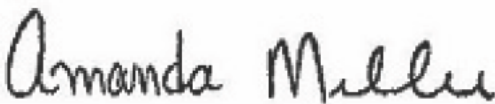
24 - - -

CERTIFICATE

I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, [REDACTED], was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Amanda Miller

Certified Realtime Reporter

Dated: April 22, 2024

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)